

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

| | |
|--|---------------------|
| ROBERT WILSON | x Civil Action No.: |
| 62 E. Johnson Street | : |
| Apartment 2 | : |
| Philadelphia, PA 19144 | : |
| | : |
| Plaintiff, | : |
| | : |
| v. | : |
| | : |
| BUCKLEY & COMPANY, INC. d/b/a | : |
| BUCKLEY & COMPANY | : |
| 3401 Moore Street | : |
| Philadelphia, PA 19145 | : |
| | : |
| and | : |
| | : |
| CITY OF PHILADELPHIA | : |
| 1515 Arch Street, 14 th Floor | : |
| Philadelphia, PA 19103 | : |
| | : |
| and | : |
| | : |
| COMMONWEALTH OF PENNSYLVANIA | : |
| DEPARTMENT OF TRANSPORTATION | : |
| Blaine & Ruffner Streets | : |
| Philadelphia, PA 19140 | : |
| | : |
| and | : |
| | : |
| AMTRAK c/o NATIONAL RAILROAD | : |
| PASSENGER CORPORATION, CLAIMS | : |
| DEPT. | : |
| 30 th Street Station | : |
| 30 th and Market Streets | : |
| Philadelphia, PA 19104 | : |
| | : |
| Defendants. | : |
| | x |

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1441(a),

defendant National Railroad Passenger Corporation ("Amtrak") hereby removes to the United States District Court for the Eastern District of Pennsylvania the case captioned Robert Wilson v. Buckley & Company, Inc. d/b/a Buckley & Company, City of Philadelphia, Commonwealth of Pennsylvania Department of Transportation, and National Railroad Passenger Corporation ("Amtrak"), July Term, 2013, No. 3230, Philadelphia County Court of Common Pleas, and as grounds for removal states as follows:

1. Amtrak has been named as a defendant in an action now pending in the Court of Common Pleas, Philadelphia County, July Term 2013, No. 3230.

2. The above-referenced action was commenced by the filing of a Complaint on July 24, 2013. (See Complaint at Exhibit A).

3. Amtrak first received a copy of the Complaint when it was delivered to Amtrak's Philadelphia claims office on August 9, 2013. (See Exhibit A).

4. This Notice is being filed within 30 days of receipt of the Complaint by Amtrak.

5. The United States District Court for the Eastern District of Pennsylvania has original jurisdiction over this action pursuant to 28 U.S.C. § 1331 because Amtrak was created by an Act of Congress, 49 U.S.C. § 29101 et seq., and more than half of its corporate stock is owned by the federal government. See 28 U.S.C. § 1349. As such, this case is removable to this Court pursuant to

28 U.S.C. § 1441(a).

6. Pursuant to 28 U.S.C. § 1446(a), all defendants who have been served with the Complaint consent to removal of this action to this Court.

7. Defendant City of Philadelphia first received a copy of the Complaint on or about August 1, 2013.

8. The City of Philadelphia has consented to Amtrak's removal of this action to the Eastern District of Pennsylvania. A copy of the City of Philadelphia's Consent to Removal is attached hereto as Exhibit B.

9. The Philadelphia County docket sheet does not reflect service of the Complaint on defendants Buckley & Company, Inc. or the Commonwealth of Pennsylvania Department of Transportation ("PennDOT"), nor has anyone entered an appearance for these defendants. (See Exhibit C).

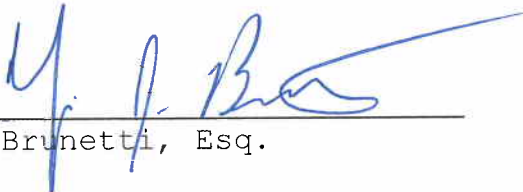
10. Neither Buckley & Company, Inc.'s nor PennDOT's consent to removal is required in this case because they have not yet been served with the Complaint.

11. Pursuant to 28 U.S.C. § 1446(a), copies of all pleadings served upon defendant Amtrak are attached hereto at Exhibit A.

WHEREFORE, Amtrak requests that the action described herein now pending in the Court of Common Pleas, Philadelphia County, be removed to this Court.

LANDMAN CORSI BALLAINE & FORD P.C.
Attorneys for Defendant
National Railroad Passenger
Corporation ("Amtrak")

BY:



Yuri J. Brunetti, Esq.

Dated: August 13, 2013

EXHIBIT A

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

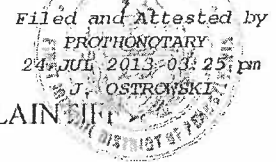
| For Prothonotary Use Only (Docket Number) | |
|--|--|
| JULY 2013 E-Filing Number: 1307041733 003230 | |
| PLAINTIFF'S NAME ROBERT WILSON | DEFENDANT'S NAME BUCKLEY & COMPANY, INC., ALIAS: D/B/A BUCKLEY & COMPANY |
| PLAINTIFF'S ADDRESS 62 E. JOHNSON STREET APARTMENT 2 PHILADELPHIA PA 19144 | DEFENDANT'S ADDRESS 3401 MOORE STREET PHILADELPHIA PA 19145 |
| PLAINTIFF'S NAME | DEFENDANT'S NAME CITY OF PHILADELPHIA |
| PLAINTIFF'S ADDRESS | DEFENDANT'S ADDRESS 1515 ARCH STREET, 14TH FLOOR PHILADELPHIA PA 19103 |
| PLAINTIFF'S NAME | DEFENDANT'S NAME COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF TRANSPORTATION |
| PLAINTIFF'S ADDRESS | DEFENDANT'S ADDRESS BLAINE & RUFFNER STREETS PHILADELPHIA PA 19140 |
| <div style="text-align: center;"> DIVISION MANAGER CLAIMS SERVICES AUG 09 2013 PHILADELPHIA, PA via hand delivery RC </div> | |
| TOTAL NUMBER OF PLAINTIFFS 1 | TOTAL NUMBER OF DEFENDANTS 4 COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions |
| AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00 | COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other: |
| CASE TYPE AND CODE 2S - PREMISES LIABILITY, SLIP/FALL | |
| STATUTORY BASIS FOR CAUSE OF ACTION | |
| RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) | FILED PRO PROTHY JUL 24 2013 J. OSTROWSKI |
| IS CASE SUBJECT TO COORDINATION ORDER? YES NO | |
| TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>ROBERT WILSON</u> Papers may be served at the address set forth below. | |
| NAME OF PLAINTIFFS/PETITIONER'S/APPELLANT'S ATTORNEY BRUCE M. GINSBURG | ADDRESS 2112 WALNUT STREET PHILADELPHIA PA 19103 |
| PHONE NUMBER (215) 564-4400 | FAX NUMBER (215) 564-4585 |
| SUPREME COURT IDENTIFICATION NO. 22187 | E-MAIL ADDRESS bginsburg@ginsburg-law.com |
| SIGNATURE OF FILING ATTORNEY OR PARTY BRUCE GINSBURG | DATE SUBMITTED Wednesday, July 24, 2013, 03:25 pm |

COMPLETE LIST OF DEFENDANTS:

1. AMTRAK
C/O NATIONAL RAILROAD 30TH & MARKET STREETS
PHILADELPHIA PA 19104
2. COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF TRANSPORTATION
BLAINE & RUFFNER STREETS
PHILADELPHIA PA 19140
3. CITY OF PHILADELPHIA
1515 ARCH STREET, 14TH FLOOR
PHILADELPHIA PA 19103
4. BUCKLEY & COMPANY, INC.
ALIAS: D/B/A BUCKLEY & COMPANY
3401 MOORE STREET
PHILADELPHIA PA 19145

GINSBURG & ASSOCIATES
BRUCE MARTIN GINSBURG, ESQUIRE
IDENTIFICATION NO: 22187
2112 WALNUT STREET
PHILADELPHIA, PA 19103
(215) 564-4400

MAJOR CASE -
JURY TRIAL DEMANDED



ATTORNEYS FOR PLAINTIFF
COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

ROBERT WILSON
62 E. Johnson Street, Apt 2
Philadelphia, PA 19144

Plaintiff,

v.

BUCKLEY & COMPANY, INC.
d/b/a BUCKLEY & COMPANY
3401 Moore Street
Philadelphia, PA 19145
and
CITY OF PHILADELPHIA
1515 Arch Street, 14th Floor
Philadelphia, PA 19103
and
COMMONWEALTH OF
PENNSYLVANIA DEPARTMENT OF
TRANSPORTATION
Blaine & Ruffner Streets
Philadelphia, PA 19140
and

AMTRAK
c/o NATIONAL RAILROAD PASSENGER
CORPORATION, CLAIMS DEPT.
30th Street Station
30th and Market Streets
Philadelphia, PA 19104

Defendants.

You have been sued in court. If you wish to defend against the claims set forth in the following pages. You must take action within (20) days after this Complaint and notice are served by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA COUNTY BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
1 READING CENTER
PHILADELPHIA, PENNSYLVANIA 19107
215-238-1701

AVISO

Le han demandado a usted en la corte. Si usted quiere defendarse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de esto demandado y la notificacion. Hace falta asentar una comparencia escrita una persona o con un abogado y entregar a la corte forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda. Usted puede perder dinero o sus propiedades o otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIAMENTE SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACION DE LICENCIADOS DE FILADELPHIA
SERVICIO DE REFERENCIAL LEGAL
One Reading Center Philadelphia,
Pennsylvania 19107
(215) 238-1701

GINSBURG & ASSOCIATES
BRUCE MARTIN GINSBURG, ESQUIRE
IDENTIFICATION NO: 22187
2112 WALNUT STREET
PHILADELPHIA, PA 19103
(215) 564-4400

**MAJOR CASE -
JURY TRIAL DEMANDED**

ATTORNEYS FOR PLAINTIFF

ROBERT WILSON
62 E. Johnson Street, Apt 2
Philadelphia, PA 19144

Plaintiff,

v.

BUCKLEY & COMPANY, INC.
d/b/a BUCKLEY & COMPANY
3401 Moore Street
Philadelphia, PA 19145
and
CITY OF PHILADELPHIA
1515 Arch Street, 14th Floor
Philadelphia, PA 19103
and
COMMONWEALTH OF
PENNSYLVANIA DEPARTMENT OF
TRANSPORTATION
Blaine & Ruffner Streets
Philadelphia, PA 19140
and
AMTRAK
c/o NATIONAL RAILROAD PASSENGER
CORPORATION, CLAIMS DEPT.
30th Street Station
30th and Market Streets
Philadelphia, PA 19104

Defendants.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

JULY TERM, 2013

No:

COMPLAINT – CIVIL ACTION
PREMISES LIABILITY

1. Plaintiff, ROBERT WILSON , is an adult individual residing at the above listed address.

2. Defendant, BUCKLEY & COMPANY, INC., d/b/a BUCKLEY & COMPANY (hereinafter "BUCKLEY") is a corporation or other legal entity organized and existing under and by virtue of the laws of the State of Pennsylvania, which regularly advertises, seeks customers, purchases goods and services, and/or conducts business in Philadelphia County, Pennsylvania, with an office for service located at the above listed address.

3. At all times material hereto, Defendant, BUCKLEY, acted by and through their duly authorized agents, ostensible agents, employees, workmen, and servants, all of whom were working in furtherance of the interests of the municipal defendant herein, BUCKLEY.

4. Defendant, CITY OF PHILADELPHIA, (hereinafter "CITY"), is a municipal corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with an office for service located at 1515 Arch Street, 14th Floor, Philadelphia, PA 19103.

5. At all times material hereto, Defendant, CITY, acted by and through their duly authorized agents, ostensible agents, employees, workmen, and servants, all of whom were working in furtherance of the interests of the municipal defendant herein, CITY.

6. Defendant, COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF TRANSPORTATION, (hereinafter "PENNDOT"), is a Commonwealth agency organized and existing under the laws of the Commonwealth of Pennsylvania, with an office for service located at Blaine & Ruffner Streets, Philadelphia, PA 19140.

7. At all times material hereto, Defendants, PENNDOT, acted by and through their duly authorized agents, ostensible agents, employees, workmen, and servants, all of whom were working in furtherance of the interests of the defendant herein, PENNDOT.

8. Defendant, AMTRAK, is a corporation, organized and existing under and by virtue of the laws of the Commonwealth of Pennsylvania, which regularly advertises, seeks customers and/or conducts business in Philadelphia County, with a registered office for service located at c/o NATIONAL RAILROAD PASSENGER CORPORATION, CLAIMS DEPT., 30th Street Station, 30th and Market Streets, Philadelphia, PA 19104.

9. At all times material to this Complaint, Defendant, AMTRAK, acted or failed to act by their agents, servants, workmen and/or employees, who were then and there acting within the scope of their authority and course of their employment with Defendant, AMTRAK, in furtherance of Defendant's business and on behalf of the Defendant, AMTRAK.

10. At all times material to this Complaint, Defendants, BUCKLEY and CITY and PENNDOT and AMTRAK, owned, operated, managed and/or controlled the property located at 30th Street Station, 30th and Market Streets, Philadelphia, PA 19104.

11. Defendants, BUCKLEY and CITY and PENNDOT and AMTRAK, were responsible for the proper maintenance of the aforesaid premises and to keep said premises safe for those lawfully upon the premises and/or stairway.

12. On or about October 3, 2011, Defendants, BUCKLEY and CITY and PENNDOT and AMTRAK, so carelessly and/or negligently allowed a dangerous and defective condition, consisting an unsafe, defective and/or raised asphalt, otherwise unprotected or unmarked, to exist and remain on the premises located at 30th Street Station, 30th and Market Streets, Philadelphia, PA 19104.

13. On or about October 3, 2011, while a business invitee at the above mentioned premises, Plaintiff, ROBERT WILSON, came into contact with said dangerous condition, consisting of unsafe, defective and raised sidewalk, otherwise unprotected and/or unmarked,

causing Plaintiff to fall and suffer injuries which form the basis of this action.

14. The aforesaid accident was due solely to the negligence and/or carelessness of Defendants, BUCKLEY and CITY and PENNDOT and AMTRAK, acting as aforesaid, and was due in no manner whatsoever to any act or failure to act on the part of the Plaintiff, ROBERT WILSON.

COUNT I – NEGLIGENCE
ROBERT WILSON vs. BUCKLEY and CITY and PENNDOT and AMTRAK

15. Plaintiff, ROBERT WILSON, hereby incorporates paragraph by reference all of the paragraphs set forth above as though fully set forth at length herein.

16. The negligence and/or carelessness of Defendants, BUCKLEY and CITY and PENNDOT and AMTRAK, acting aforesaid, consisted of the following:

- a. Allowing and causing a dangerous and defective condition to exist at the aforesaid location, of which Defendants knew or should have known by the exercise of reasonable care;
- b. Failing to remove said dangerous condition of which Defendants knew or should have known and which constituted a danger to persons lawfully walking thereon;
- c. Failing to correct said dangerous condition of which Defendants knew or should have known and which constituted a danger to persons lawfully walking thereon;
- d. Failing to keep and maintain the aforesaid premises in a reasonably safe condition;
- e. Failing to provide and maintain an unobstructed and safe route of travel for Plaintiff;
- f. Failing to barricade or otherwise contain the area where said dangerous condition existed;
- g. Failing to warn persons on the premises of the existence of said dangerous condition of which Defendants knew or should have known;
- h. Disregarding the rights and safety of the Plaintiff; and

i. Failing to exercise due care under the circumstances.

17. As a result of this accident, Plaintiff, ROBERT WILSON, has suffered injuries which are or may be serious and permanent in nature, including but not limited to injuries to his shoulder, wrist, back and knees and neck, including disc herniations at C2/3 and C3/4, as well as other injuries as may be diagnosed by Plaintiff's health care providers, all of which injuries have in the past, and may in the future, cause Plaintiff great pain and suffering.

18. As a further result of this accident, Plaintiff, ROBERT WILSON, has been or will be required to receive and undergo medical attention and care and to expend various sums of money and to incur various expenses and may be required to continue to expend such sums or incur such expenditures for an indefinite time in the future.

19. As a further result of this accident, Plaintiff, ROBERT WILSON, has suffered medically determinable physical and/or mental impairment which prevents the Plaintiff from performing all or substantially all of the material acts and duties which constituted the Plaintiff's usual and customary activities prior to the accident.

20. As a direct and reasonable result of the aforementioned accident, Plaintiff, ROBERT WILSON, has or may hereafter incur other financial expenses which do or may exceed amounts which Plaintiff may otherwise be entitled to recover.

21. As a further result of the accident aforementioned, Plaintiff, ROBERT WILSON, has suffered severe physical pain, mental anguish and humiliation, and may continue to suffer same for an indefinite time in the future.

WHEREFORE, Plaintiff, ROBERT WILSON, demands judgment against Defendants, BUCKLEY and CITY and PENNDOT and AMTRAK, in excess of Fifty Thousand (\$50,000.00) Dollars, plus interest and costs.

GINSBURG & ASSOCIATES

By:

A handwritten signature in black ink, appearing to read 'BMG', is written over the printed name of the attorney.

BRUCE MARTIN GINSBURG
Attorney for Plaintiff

VERIFICATION

Plaintiff verifies that the statements made in this pleading are true and correct to the best of plaintiff's knowledge, information and belief. To the extent that the pleading contains averments of law and language of counsel and results of investigation, plaintiff has relied on counsel. Plaintiff understands that false statements herein are made subject to penalties of 18 Pa. §4904, relating to unsworn falsification to authorities.

Robert E. Wilson

EXHIBIT B

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

| | |
|-------------------------------|---------------------|
| ROBERT WILSON | x Civil Action No.: |
| | : |
| Plaintiff, | : |
| | : |
| v. | : |
| | : |
| BUCKLEY & COMPANY, INC. d/b/a | : |
| BUCKLEY & COMPANY | : |
| | : |
| and | : |
| | : |
| CITY OF PHILADELPHIA | : |
| | : |
| and | : |
| | : |
| COMMONWEALTH OF PENNSYLVANIA | : |
| DEPARTMENT OF TRANSPORTATION | : |
| | : |
| and | : |
| | : |
| AMTRAK c/o NATIONAL RAILROAD | : |
| PASSENGER CORPORATION | : |
| | : |
| Defendants. | x |

CONSENT TO REMOVAL

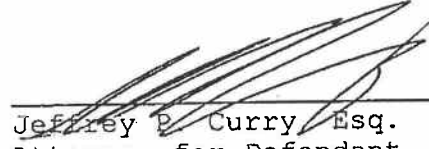
1. The City of Philadelphia has been named as a defendant in the action entitled Robert Wilson v. Buckley & Company, Inc. D/b/a Buckley & Company, City of Philadelphia, Commonwealth of Pennsylvania Department of Transportation, and National Railroad Passenger Corporation ("Amtrak"), now pending in the Philadelphia Court of Common Pleas, No. 003230, July 2013 Term.

2. The City of Philadelphia was first served with a copy of the Complaint on or about August 1, 2013.

3. The City of Philadelphia hereby consents to and joins in

the removal of this action to the United States District Court for the Eastern District of Pennsylvania.

BY:


Jeffrey P. Curry Esq.
Attorney for Defendant
The City of Philadelphia

Dated:

8/13/2013

EXHIBIT C



The Philadelphia Courts

Civil Docket Access

No Items in Cart | **LOGIN**

Civil Docket Report

A \$5 Convenience fee will be added to the transaction at checkout.

Case Description

Case ID: 130703230
Case Caption: WILSON VS BUCKLEY & COMPANY, INC. ETAL
Filing Date: Wednesday, July 24th, 2013
Court: MAJOR JURY-STANDARD
Location: City Hall
Jury: JURY
Case Type: PREMISES LIABILITY, SLIP/FALL
Status: WAITING TO LIST CASE MGMT CONF

Related Cases

No related cases were found.

Case Event Schedule

No case events were found.

Case motions

No case motions were found.

Case Parties

| Seq # | Assoc | Expn Date | Type | Name |
|-----------------|---|-----------|------------------------|-------------------|
| 1 | | | ATTORNEY FOR PLAINTIFF | GINSBURG, BRUCE M |
| Address: | 2112 WALNUT STREET PHILADELPHIA PA 19103 (215)564-4400 | | Aliases: | <i>none</i> |
| 2 | 1 | | PLAINTIFF | WILSON, ROBERT |
| Address: | 62 E. JOHNSON STREET APARTMENT 2 | | Aliases: | <i>none</i> |

PHILADELPHIA
PA 19144

3

DEFENDANT

BUCKLEY & COMPANY,
INC.

Address: 3401 MOORE
STREET
PHILADELPHIA
PA 19145

Aliases: D/B/A BUCKLEY & COMPANY

4

7

DEFENDANT

CITY OF PHILADELPHIA

Address: 1515 ARCH
STREET, 14TH
FLOOR
PHILADELPHIA
PA 19103

Aliases: none

5

DEFENDANT

COMMONWEALTH OF
PENNSYLVANIA
DEPARTMENT OF
TRANSPORTATION

Address: BLAINE &
RUFFNER
STREETS
PHILADELPHIA
PA 19140

Aliases: none

6

DEFENDANT

AMTRAK

Address: C/O NATIONAL
RAILROAD
30TH & MARKET
STREETS
PHILADELPHIA
PA 19104

Aliases: none

7

ATTORNEY
FOR
DEFENDANT

CURRY, JEFFREY P



Address: 1515 ARCH
STREET

Aliases: none

| | | | |
|-----------------|--|-----------------|-------------------|
| | 14TH FLOOR PHILADELPHIA PA 19102 (215)683-5373 | | |
| 8 | | TEAM LEADER | BERNSTEIN, MARK I |
| Address: | 530 CITY HALL PHILADELPHIA PA 19107 (215)686-7335 | Aliases: | none |

Docket Entries

| Filing Date/Time | Docket Type | Filing Party | Disposition Amount | Approval/Entry Date |
|-------------------------|--|----------------------|--------------------|-------------------------|
| 24-JUL-2013 03:25 PM | ACTIVE CASE | | | 24-JUL-2013 03:32 PM |
| Docket Entry: | E-Filing Number: 1307041733 | | | |
| 24-JUL-2013 03:25 PM | COMMENCEMENT CIVIL ACTION JURY | GINSBURG, BRUCE M | | 24-JUL-2013 03:32 PM |
| Documents: | Click link(s) to preview/purchase the documents Final Cover <div>  Click HERE to purchase all documents related to this one docket entry </div> | | | |
| Docket Entry: | none. | | | |
| 24-JUL-2013 03:25 PM | COMPLAINT FILED NOTICE GIVEN | GINSBURG, BRUCE M | | 24-JUL-2013 03:32 PM |
| Documents: | Click link(s) to preview/purchase the documents MX-3110N 20130724 150932.pdf <div>  Click HERE to purchase all documents related to this one docket entry </div> | | | |
| Docket Entry: | COMPLAINT WITH NOTICE TO DEFEND WITHIN TWENTY (20) DAYS AFTER SERVICE IN ACCORDANCE WITH RULE 1018.1 FILED. | | | |
| 24-JUL-2013 03:25 PM | SHERIFF'S SURCHARGE 4 DEFTS | GINSBURG, BRUCE M | | 24-JUL-2013 03:32 PM |

| | | | | |
|-------------------------|---|----------------------|--|-------------------------|
| Docket Entry: | none. | | | |
| 24-JUL-2013 03:25 PM | JURY TRIAL PERFECTED | GINSBURG, BRUCE M | | 24-JUL-2013 03:32 PM |
| Docket Entry: | 8 JURORS REQUESTED. | | | |
| 24-JUL-2013 03:25 PM | WAITING TO LIST CASE MGMT CONF | GINSBURG, BRUCE M | | 24-JUL-2013 03:32 PM |
| Docket Entry: | none. | | | |
| 05-AUG-2013 01:18 PM | ENTRY OF APPEARANCE FILED | CURRY, JEFFREY P | | 05-AUG-2013 02:12 PM |
| Documents: | Click link(s) to preview/purchase the documents Entry and Demand.pdf <div>  Click HERE to purchase all documents related to this one docket entry </div> | | | |
| Docket Entry: | ENTRY OF APPEARANCE OF JEFFREY P CURRY FILED. (FILED ON BEHALF OF CITY OF PHILADELPHIA) | | | |
| 05-AUG-2013 01:18 PM | JURY TRIAL PERFECTED | | | 05-AUG-2013 02:12 PM |
| Docket Entry: | 12 JURORS REQUESTED. | | | |
| 05-AUG-2013 01:18 PM | CITY CHARGE SUBSEQUENT FILINGS | CURRY, JEFFREY P | | 05-AUG-2013 02:12 PM |
| Docket Entry: | none. | | | |
| 08-AUG-2013 03:32 PM | AFFIDAVIT OF SERVICE FILED | | | 09-AUG-2013 12:38 PM |
| Documents: | Click link(s) to preview/purchase the documents Affidavit of Service <div>  Click HERE to purchase all documents related to this one docket entry </div> | | | |
| Docket | AFFIDAVIT OF SERVICE OF PLAINTIFF'S COMPLAINT UPON CITY OF | | | |

Entry: PHILADELPHIA BY PERSONAL SERVICE ON 08/01/2013 FILED.

► [Case Description](#)

► [Related Cases](#)

► [Event Schedule](#)

► [Case Parties](#)

► [Docket Entries](#)

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